

KEANE & MARLOWE, LLP
Attorneys for Defendants
REPINTER INTERNATIONAL SHIPPING CO. LTD.
and MIACHART CORPORATION
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Mary Ann C. Marlowe (MM-0723)
Christopher P. Keane (CK-4394)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
BELARUSSIAN SHIPPING CO.,

Plaintiff,

-against-

07 Civil 3151 (LTS)

REPINTER INTERNATIONAL SHIPPING
CO. S.A. and MIACHART CORPORATION
LLC.,

ECF Case

Defendants.

-----X

VERIFIED ANSWER

Defendants, Repinter International Shipping Co. S.A. (hereinafter “Repinter”)
and Miachart Corporation LLC (hereinafter “Miachart”), (hereinafter collectively
“Defendants” or “Charterers”), through their undersigned attorneys, for their Answer
hereby allege:

1. Admit the allegations of paragraph 1 of the Verified Complaint.
2. Deny knowledge or information sufficient to form a belief as to the truth of the
allegations contained in paragraph 2 of the Verified Complaint.
3. Admit the allegations contained in paragraph 3 of the Verified Complaint.
4. Admit the allegations contained in paragraph 4 of the Verified Complaint.

5. Admit the allegations contained in paragraph 5 of the Verified Complaint.
6. Admit the allegations contained in paragraph 6 of the Verified Complaint.
7. Deny the allegations contained in paragraph 7 of the Verified Complaint.
8. Deny the allegations contained in paragraph 8 of the Verified Complaint.
9. Deny the allegations contained in paragraph 9 of the Verified Complaint.
10. Deny the allegations contained in paragraph 10 of the Verified Complaint.
11. Admit the allegations contained in paragraph 11 of the Verified Complaint.
12. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 12 of the Verified Complaint.
13. Deny that Defendants are liable for any of the amounts set forth in paragraph 14 of the Verified Complaint and leave Plaintiff to its proofs.
14. Deny that Defendants are liable for any of the amounts set forth in paragraph 14 of the Verified Complaint and leave Plaintiff to its proofs.
15. Deny the allegations contained in paragraph 15 of the Verified Complaint.
16. Deny the allegations contained in paragraph 16 of the Verified Complaint.
17. Deny having knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 17 of the Verified Complaint.
18. Admit that Defendants cannot, within the meaning of Rule B of the Supplemental Rules for Certain Admiralty and Maritime Claims of the Federal Rules of Civil Procedure, be found within this District but deny the remaining allegations set forth in paragraph 18 of the Verified Complaint.
19. Paragraph 19 of the Verified Complaint does not contain any allegations which require a response on the part of Defendants.

AS AN AFFIRMATIVE DEFENSE

20. Defendants reserve the right to submit all claims to arbitration in London and to have this action dismissed or stayed pending arbitration in London.

WHEREFORE, Defendants pray as follows:

1. That this matter be stayed pending arbitration in London;
2. That this Court retain jurisdiction over this matter through the entry of any judgment or award associated with any of the claims currently pending or which may be initiated in the future between the parties herein, including any appeals hereof; and,
3. That this Court award Defendants the attorneys' fees and costs incurred in this action; and
4. That this Court grant Defendants such other, further, and different relief as may be just, proper, and equitable in the circumstances.

Dated: New York, New York
November 29, 2007

KEANE & MARLOWE
Attorneys for Defendants
Repinter International Shipping Co. S.A.
and Miachart Corporation LLC



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TO: Tisdale Law Offices, LLC
Attn: Lauren C. Davies, Esq.
Attorneys for Plaintiff
Belarussian Shipping Co.
11 West 42nd Street, Suite 90
New York, New York 10036
(212) 354-0025

VERIFICATION

State of New York)
) ss.:
County of New York)

MARY ANN C. MARLOWE, being duly sworn, deposes and says:

1. I am a member of the Bar of this Honorable Court and of the firm of Keane & Marlowe, LLP, attorneys for Defendants Repinter International Shipping Co. S.A. and Miachart Corporation LLC, and am authorized to make this Verification on their behalf.

2. I have read the foregoing Verified Answer and the contents thereof are true and accurate to the best of my knowledge, information and belief.

3. The reason this Verification is made by me and not the Defendants is that the Defendants are corporations, none of whose officers are present in this District.

4. The source of my knowledge and belief is information and documents furnished to me by Defendants and their English solicitors, all of which I believe to be true and accurate.


Mary Ann C. Marlowe (MM 0723)

Sworn to before me this
29 day of November 2007



Notary Public

CHRISTOPHER P. KEANE JR.
NOTARY PUBLIC STATE OF NEW YORK
NO. 02KE5046104
QUALIFIED IN NEW YORK COUNTY
COMMISSION EXPIRES JULY 3, 2011